EIS Comment on Wind-Blown Coal Dust Emissions from the Proposed Gateway Pacific Terminal

My name is Michael Crum. As a homeowner who moved to this area for its overall environmental beauty and quality of life, I am deeply concerned about a number of reasonably foreseeable, significant adverse impacts related to the proposed Gateway Pacific Terminal (GPT) including, but not limited to: wind-blown coal dust emissions spreading over surrounding wetlands, aquatic reserves, farmland, homes, businesses, corporations and beaches within a five mile radius of the proposed terminal site.

The above image, taken April 12, 2012, shows wind-blown coal dust at Westshore Terminal near Tsawassen, B.C. As reported in *The Delta Optimist,* Westshore Terminal general manager, Denis Hogan, attributed the coal dust cloud to "… an unexpected gust of wind." That gust was determined to be 20-30 mph. A 2001 Canadian study of coal dust emissions estimated that the Westshore Terminal emits roughly 1.5 million pounds of coal dust each year. The proposed GPT at Cherry Point would be more than double the size of Westshore with a reasonably foreseeable three (3) million pounds of coal dust emissions annually. Coal dust contains toxic substances such as lead, mercury, arsenic, benzene and formaldehyde. These substances can cause serious health problems including: cancer, heart attack, asthma and birth defects. There is no safe level of exposure to these substances, according to a research review conducted by more than 200 Whatcom County physicians.

The proposed GPT's 80-acre, open and uncovered (60 feet high, two and a half mile long) stockpiles, containing 2.75 million metric tons of coal, would be located in one of the windiest areas in northwest Washington. In October 2012, for example, steady winds at Cherry Point (measured by the NOAA marine buoy, BUOYCHYW1) equaled or exceeded 20 mph on 20 out of 31 days, with gusts exceeding 30 mph on six of those days. Wind direction would not lessen potential direct adverse impacts of wind-blown coal dust emissions, e.g., winds E, ENE and NE could result in adverse impacts on the Cherry Point Aquatic Reserve. Winds S, SSW or SSE could result in adverse impacts on BP Cherry Point Refinery as well as the waters and neighborhoods of Birch Bay. Winds W, WNW or WSW could result in adverse impacts on nearby agricultural areas and the residents of Ferndale and the Lummi Nation.

Considering the aforementioned, reasonably foreseeable and potentially significant adverse impacts beyond the proposed GPT industrial site, I ask that the EIS include and systematically analyze the following:

- Impacts of wind-blown coal dust emissions from the proposed GPT's uncovered 80-acre coal stockpiles on the health of the thousands of residents living and working within a five mile radius of the proposed GPT … and determine whether any identified significant adverse impacts would be cumulative.
- Impacts of the GPT's proposed use of high-volume, water sprinkler systems that would withdraw massive quantities of water, estimated to be 1.9 billion gallons of water per year or 5.3 million gallons per day (more than that used by the City of Ferndale!), from the Nooksack River, on the availability of Public Utility District (PUD) water resources for local families, small business owners, agricultural irrigation customers, and Cherry Point area industrial customers.

- Impacts of the GPT's proposed water consumption upon the Lummi Nations' documented (by Treaty) and existing water rights to the Nooksack River.
- If results from the above studies confirm significant adverse impacts from wind-blown coal dust emissions and/or extraordinary water consumption, I ask that any building permit for the GPT require all coal dust emissions to be mitigated by completely enclosing and covering the entire 80-acre coal stockpile area ("East Loop") with a structure that prevents the escape of any and all airborne coal dust emissions.